

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

Vantage Financial Services, Inc.
Plaintiff

v.

NonProfit Service Group Inc. and George E.
Miller
Defendant

CIVIL ACTION NO. 04-11686WGY

**DEFENDANTS' MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1), without waiving any jurisdictional defenses or objections, defendants NonProfit Service Group Inc. and George E. Miller move that the time by which they must respond to the complaint be enlarged by thirty days, up to and including September 9, 2004. In support of this motion, defendants state:

1. On July 13, 2004, plaintiff filed this case in Suffolk Superior Court. On July 30, 2004, defendants removed the case to this Court.
2. Plaintiff served defendants with copies of the summons and complaint in the state court action on or about July 19, 2004. Consequently, under Fed. R. Civ. P. 6 and 81(c), defendants' responses to the complaint are due on or before August 9, 2004.
3. This case arises, in part, from prior litigation¹ and related contract negotiations involving complex technical and factual issues. Defendants therefore require additional time to

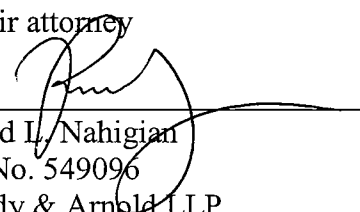
¹ *United States ex. rel. Lawrence Saklad v. Henry R. Lewis, et al.*, United States District Court, District of Massachusetts, Civil Action No. 97-10052-MLW.

respond to the complaint. Additional time is also necessary in order to afford counsel sufficient time to investigate and possibly pursue jurisdictional defenses.

4. It is defendants' understanding, based on communications between counsel, that plaintiff does not oppose the enlargement sought by means of this motion.

WHEREFORE, the time by which defendants must respond to the complaint should be enlarged by thirty days up to and including September 9, 2004.

Respectfully submitted,
NonProfit Service Group Inc. and
George E. Miller,
By their attorney

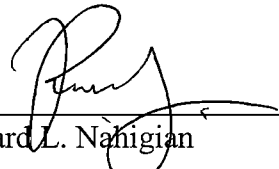


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LOCAL RULE 7.1(A)(2)

On August 2, 2004, I conferred by telephone with plaintiff's counsel, Laurence Johnson, concerning the foregoing motion. At that time, Mr. Johnson agreed to a thirty day extension of the time by which defendants must respond to the complaint.

Dated: August 4, 2004



Richard L. Nahigian